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July 5, 2024

Via ECF

Hon. Richard M. Berman, USDJ
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Segundo Torres 24mj493 (RMB)

Dear Judge Berman,

I am the attorney for Mr. Segundo Torres in the above referenced matter and I understand that this matter will now be heard before this Court. This application is submitted seeking a temporary bond modification to allow Mr. Torres to travel to Aguadilla, Puerto Rico with his wife and family. If approved, Mr. Torres will travel to Puerto Rico Tuesday July 9th, stay at the Embassy Suites in San Juan (800 Jose M. Tartak Ave., Carolina San Juan 00979) and return to the District on Tuesday July 23rd. Please note that at the presentment in this matter, counsel alerted the Court to this planned trip and that the tickets were purchased on or about September 15, 2023. We also note that the Government has no objection to this application.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Respectfully submitted,

-S-

Cc: All counsel, by ecf

Application granted on consent.

SO ORDERED:

Date: 7/8/24

Richard A. Berman
Richard A. Berman U.S.D.J.